UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

August 2, 2011

Heather Berg
Acting District Ranger
North Fork Ranger District
12730 Highway 12
Orofino, Idaho 83844

Re: EPA Region 10 Review of the Lower Orogrande Draft Environmental Impact Statement (DEIS). EPA Project Number 10-001-AFS.

Dear Ms. Berg:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (DEIS) for the Lower Orogrande (CEQ Number 20110171) located on the North Fork Ranger District of the Clearwater National Forest in Idaho. Our review of the DEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the DEIS considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The DEIS analyzes the no action alternative (Alternative 1) and two action alternatives that propose to improve watershed conditions, improve stand vigor, and promote a trend in the historical range to improve wildlife security over a 21,560 acre area in the Orogrande Creek watershed. The actions include vegetation improvements, road decommissioning, culvert replacement, and road closures within a block of elk security habitat. Alternative 2 is the preferred Alternative and differs from Alternative 3 by including construction of temporary roads (2.4 mi), an approximate 10% increase acreage of regeneration harvest (690 acres) and 14% increase of commercial thinning (500 acres). Other design features such as protecting riparian habitat conservation areas (RHCAs) through INFISH buffer requirements and implementing BMPs to protect water quality are common to both action alternatives. We support the purpose and need to restore watershed conditions and promote habitat and acknowledge the effort to significantly reduce roads by 40% in the project area. Our concerns and recommendations focus on impacts to watershed, road density, and elk habitat, which are identified as main issues in the EIS.

SEDIMENT/COBBLE EMBEDDEDNESS

The DEIS states that all streams in the project area except Lower Orogrande Creek are not meeting the Forest Plan Standard of 35% for cobble embeddedness. One of the main issues identified is the need to reduce sediment delivery by decommissioning roads to improve watershed conditions and aquatic habitat. We agree with the need to decommission problem area roads contributing sediment that are impacting beneficial uses. However, while the EIS states that 25 miles of the total 89 miles of roads proposed for decommissioning would be in RHCAs, it does not identify the criteria for selecting which

roads would be decommissioned. Appendix B includes a table listing each road segment to be decommissioned and establishes a rating of risk to aquatic habitat as high, moderate, or low. Of the 88.8 miles of roads only approximately 25% of the selected road segments are rated high or moderate. We support removing roads in RHCA's; however, we are unclear about the strategy for selecting roads in the project area and how much this would improve habitat conditions since many of the roads being decommissioned appear to be low priority. *For the final EIS, we recommend including the criteria for determining selection of sites for road decommissioning (e.g., priority stream reaches), along with maps that identify priority areas and streams as well as roads proposed for decommissioning.*

The WEPP model was used to predict sediment yield from activities. The DEIS includes a predicted range of 7%-10% increase of sediment delivery in streams after the first year of disturbance (Table 4.3), but states that mitigation would reduce the likelihood of sediment delivery. Although this qualitatively meets the requirement of no measureable increase, it is not clear how the proposal meets the need described in the DEIS to improve watershed conditions and reduce cobble embeddedness rather than maintain existing conditions. It is also not clear what inputs were used in the model for expected precipitation (e.g, annual, seasonal, high precip event). The final EIS should discuss the hydrograph of the watershed and provide outcomes based on varying precipitation events to understand the probability of impacts from activities. Modeled parameters can dramatically affect the outcomes and because sediment is a driving issue, we believe this should be described in detail and carefully considered when designing alternatives and mitigation. *We recommend that the final EIS provide additional detail regarding hydrology and precipitation. We also recommend that the final EIS quantify how predicted outcomes would result in reduced sediment/cobble embeddedneess to achieve standards.*

ROAD DENSITY

We have concerns with road density in the project area. Our comments focus on two resource areas: watershed condition and elk habitat. In general, the DEIS discusses road density related to watershed condition and elk habitat. The current road density described for the watershed is an average road density of 6.1 mi/mi^2 and for elk habitat there is a standard open road density of 1.8 mi/mi^2. It is not clear if average road density is different from standard road density and how they overlap in terms of desired condition on the forest. *We recommend that the EIS more clearly discuss how road density is determined and if or how they overlap in the overall desired condition.*

Below are our specific comments related to road density as it pertains to the DEISs discussion on watershed and elk habitat.

Watershed Condition

The DEIS states that the aim for watershed condition is a road density of 1.1mi/mi^2 (Pg 14). The DEIS states that the road density from both alternatives would be reduced from 6.1 mi/mi^2 to 3.6 mi/mi^2 a reduction of 2.5 mi/mi^2. The goal of 1.1mi/mi^2 is only mentioned in the issues and indicators section related to watersheds. The DEIS does not address how this ultimate target could be reached; it does not include an alternative that could attain this, nor is this figure used in the analysis as a contrast to understand the level of environmental benefits on the landscape from the proposed action. Although the Forest may not be able to attain this goal through this project, the analysis should include a discussion of how this number was derived and how it could be reached in the future. *We recommend that the final EIS contrast and compare (numerically or qualitatively) a road density of 1.1mi/mi^2 to the proposal in terms of environmental effects and we recommend considering developing an alternative that would attain this goal or explain why this is not included in the analysis.*

Elk Habitat

Roads can be a major factor affecting elk populations across forests and the method for analyzing impacts to a population is a key factor. The DEIS utilizes elk habitat effectiveness (%) and road density (mi/mi^2) as a measure to analyze impacts to elk populations. The current elk habitat effectiveness is 48% with an average road density of 1.7 mi/mi^2. Both action alternatives propose a reduction to 47% habitat effectiveness and increase of average road density to 1.8 mi/mi^2. The DEIS also includes a discussion on security habitat where elk seek refuge if their normal range is disturbed. The current security habitat is 1,200 acres and the action alternatives would increase this area to approximately 3,000 to 3,600 acres. The DEIS does not define the applicability of measures or explain if one is more critical to elk populations than the other. And although the increase is small for open road density, it is not clear how the impact from open road density relates to the benefit from increased security habitat on elk. It would be useful to include a more detailed discussion on the predicted benefit of increasing security habitat since it appears that security habitat would be unnecessary if their traditional habitat was unaffected. Furthermore, it would be helpful to understand if a distance band approach[1] would be more appropriate than the traditional open road density. *For the final EIS, we recommend including a more detailed discussion on methods to measure impacts to elk populations. We also recommend considering an alternative that increases elk habitat effectiveness and decreases road density to more clearly contrast the effects of the alternatives and determine if additional protection for elk can occur.*

Based on the lack of information on site selection and watershed improvements and our concern with impacts to aquatic and elk habitat, we have rated this DEIS as EC-2 (Environmental Concerns – Insufficient Information). An explanation of this rating is enclosed. We appreciate the opportunity to provide comments, and I encourage you to contact me with any questions at (206) 553-1601 or by electronic mail at Reichgott.christine@epa.gov , or you may contact Lynne McWhorter of my staff at (206) 553-0205 or by electronic mail at mcwhorter.lynne@epa.gov .

Sincerely,

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

[1] M. M. Rowland et al., 2005. Effects of Roads on Elk: Implications for Management in Forested Ecosystems. Transactions of the 69th North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, Kansas, USA.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.